EXHIBIT 257

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|---|---|
| **From**: | Hartle, Nate [/O=MCKESSON/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=ELYWWE644F] |
| **Sent**: | 5/1/2015 5:05:38 PM |
| **To**: | Peck, Krista [krista.peck@mckesson.com] |
| **CC**: | Hartle, Nate [nate.hartle@mckesson.com] |
| **Subject**: | FW: Threshold Reduction Initiative - 9143 and 9144 |

Hi Krista. I am ready to make the threshold reduction changes for ISMC in 9143 and 9144 as discussed on previous calls, and wanted to check in quick to make sure you are good with me moving forward. Gary, Lisa and Bernard are all good and below is an email I would like to send out today after the changes. I have also attached two reports that I created and I am still editing. One is outlining the high level process, and the other is for these specific changes. I will try and ping you on IM as well knowing that you are extremely busy today I am sure.

Nate

**Nate Hartle** | Sr Director - Regulatory Affairs | McKesson Corporation - Retail National Accounts | (o) 763-270-0230 | (m) 763-443-4687 | Nate.Hartle@McKesson.com

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**From:** Hartle, Nate
**Sent:** Friday, May 01, 2015 11:45 AM
**To:** Hartle, Nate
**Subject:** Threshold Reduction Initiative - 9143 and 9144

As discussed during the AZ Regulatory Affairs team meeting, we have finalized the methodology to programmatically reduce thresholds and we have made the changes in SAP for 9143 (oxycodone) and 9144 (oxy 30mg). Below are a few comments on the process:

- **ISMC Only** – This reduction was focused on the IMC segment only.
- **Methodology** – As outlined during the meeting, customer purchases over six months were used, along with a buffer and rounding.
- **SAP** – The reason text used was "Per Threshold Reduction Initiative 5-1-15 NJH."
- **Customer List** – A separate spreadsheet with DC totals and customer lists has been created and stored on the R drive. This is a copy for review purposes only and the original data is stored elsewhere. It can be accessed using the following link. R:\Customer Documentation\Threshold Reduction Initiative
- **Next Base Codes** – We are in the process of reviewing next base codes and will follow the same process.

If anyone has questions please let us know.

Thanks,
Nate

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## McKesson's Controlled Substance Monitoring Program
## Oxycodone Threshold Reduction Report (ISMC Only)

**Date:** May 1st, 2015
**By:** Nate Hartle, Sr. Director of Regulatory Affairs

**OVERVIEW:**
On this date, I Nate Hartle, Sr. Director of Regulatory Affairs made reductions to 9143 (oxycodone) and 9144 (oxycodone 30mg) thresholds in the SAP system using the methodology defined in the "Threshold Reduction Initiative" report. These specific changes are limited to pure ISMC customers as RNA was reduced in February and MHS will be addressed at a future date.

**REDUCTION METHODOLOGY:**
1. **Customer Purchases** – Review previous 6 months by base code and identified maximum month.
2. **New Threshold Amount** – Apply a 20% buffer to the maximum amount and round to the nearest 1000.
3. **Default Thresholds** – Set the lowest amount at the family default for the base code.
4. **Current Threshold Review** – Identify only customers where the new threshold is less than the current threshold.
5. **Recent Onboardings / Threshold Changes** – Remove new customers and those who have had TCRs in the specific base code during the last 6 months.

**TCR AUDIT:**
On 4-30-15 the final list of registrants was audited to determine if any threshold changes had been made since April 1st. 1 customer had a TCR processed so they were removed and 23 others that were reduced remained on the list. Those customers will be set using the newly proposed threshold to ensure consistency with the methodology. In select cases this means a small increase in thresholds to set at the default.

**9144 DEFAULT:**
As part of this reduction process, the family default for the 9144 subset was set at 50% of the 9143 total for ISMC.

**SAP CHANGES:**
All registrants being reduced were put into a CSV file and uploaded into SAP on May 1st, 2015 with the reason text "Per Threshold Reduction Initiative 5-1-15 NJH." All information is located in a folder on the R drive.

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**FINAL TOTALS:**

Below are the final reduction totals by DC for both 9143 and 9144.

| DC | 9143 (Oxycodone) | | 9144 (Oxy 30mg) | |
|---|---|---|---|---|
| | # Customers | Total Reduction Amount | # Customers | Total Reduction Amount |
| 8110 | 27 | (143,000) | 25 | (145,000) |
| 8113 | 22 | (21,500) | 36 | (234,000) |
| 8115 | 20 | (51,000) | 93 | (355,750) |
| 8120 | 81 | (272,500) | 136 | (614,750) |
| 8126 | 121 | (96,000) | 78 | (117,800) |
| 8128 | 14 | (9,500) | 27 | (77,200) |
| 8130 | 2 | (3,500) | 1 | (1,500) |
| 8131 | 33 | (85,000) | 54 | (133,500) |
| 8132 | 29 | (74,500) | 176 | (425,000) |
| 8138 | 22 | (29,000) | 34 | (41,950) |
| 8144 | 14 | (16,400) | 94 | (237,000) |
| 8147 | 11 | (16,000) | 27 | (44,900) |
| 8148 | 83 | (251,000) | 173 | (411,150) |
| 8149 | 113 | (106,500) | 74 | (153,000) |
| 8152 | 5 | (5,300) | 36 | (103,000) |
| 8155 | 166 | (237,500) | 247 | (1,217,200) |
| 8164 | 59 | (155,800) | 103 | (301,500) |
| 8165 | 135 | (172,600) | 274 | (1,419,500) |
| 8166 | 6 | (22,900) | 83 | (210,500) |
| 8170 | 7 | (27,000) | 21 | (67,100) |
| 8173 | 24 | (59,500) | 50 | (137,000) |
| 8175 | 11 | (16,700) | 62 | (162,000) |
| 8180 | 41 | (109,000) | 75 | (152,400) |
| 8182 | 46 | (29,500) | 48 | (39,250) |
| 8183 | 17 | (73,500) | 228 | (618,500) |
| 8191 | 37 | (99,500) | 66 | (291,500) |
| 8195 | 20 | (38,500) | 33 | (48,000) |
| 8772 | 57 | (101,000) | 57 | (15,095,335) |
| **Total** | **1223** | | **2411** | |

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## McKesson's Controlled Substance Monitoring Program
## Threshold Reduction Initiative

**Date:** May 1st, 2015
**By:** Nate Hartle, Sr. Director of Regulatory Affairs

**OBJECTIVE:**
To establish a programmatic process to reduce the gap between customer purchases and thresholds.  The process will be used as an interim step until the AGI statistical threshold model is fully implemented.

**PHASES/PROCESS:**
1. **Data Organization & Review:** Organize threshold and purchase data into a simple format for review.
2. **Reduction Methodology:** Develop a consistent reduction methodology that can be applied programmatically.
3. **Feedback:** Gather feedback on methodology, recommendations and implementation.  Make adjustments as needed.
4. **Test:** Test the systematic reduction of thresholds using the new methodology and expand to next base codes over time.
5. **Communication:** Provide communication to the Regulatory Affairs team on base code changes.
6. **Next Base Codes:** Repeat the process for additional base codes as decided on by leadership.
7. **Follow Up:** Review each selected base code every six months, or until the AGI model is fully implemented.

**DATA SOURCES:**
- **Customer Purchases** – Monthly purchases by base code for the previous 6 months
- **Current Thresholds** – Thresholds by base code
- **Threshold Adjustments** – Past changes to thresholds

**REDUCTION METHODOLOGY:**
1. **Customer Purchases** – Review previous 6 months by base code and identify maximum month.
2. **New Threshold Amount** – Apply a 20% buffer to the maximum amount and round to the nearest 1000.
3. **Default Thresholds** – Set the lowest amount at the family default for the base code.
4. **Current Threshold Review** – Identify only customers where the new threshold is less than the current threshold.
5. **Recent Onboardings / Threshold Changes** – Remove new customers and those who have had TCRs in the specific base code during the last 6 months.
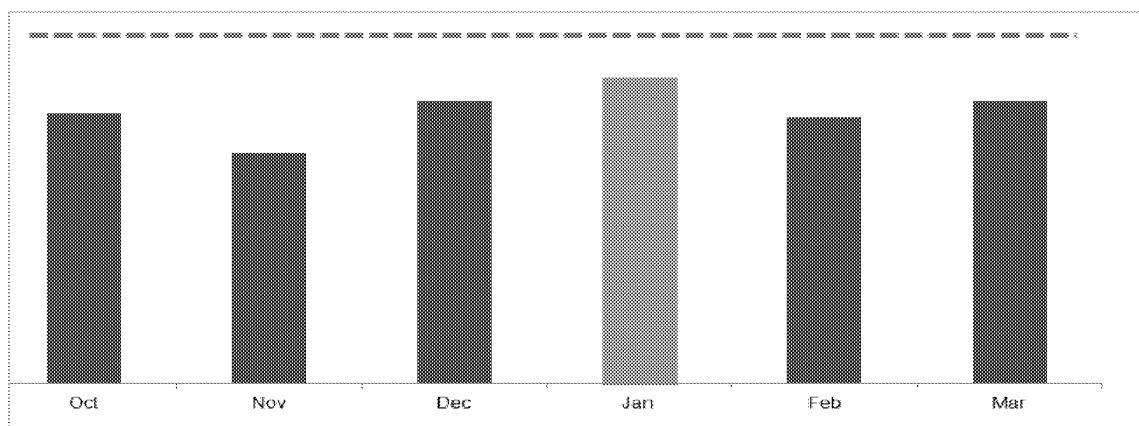
**SAP CHANGES:**
All registrants identified for base  code reductions will be consolidated into one CSV file and uploaded into SAP by one McKesson Regulatory Affairs team member with appropriate authorization.  The reason text uploaded to SAP will be "Per Threshold Reduction Initiative – Date – Initials."
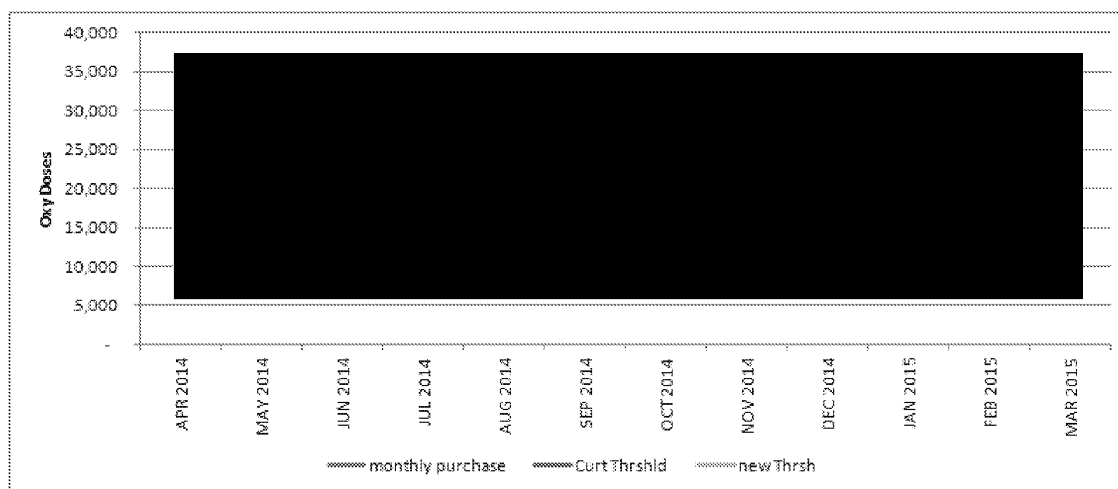
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DATA ORGANIZATION EXAMPLE:



REDUCTION METHODOLOGY EXAMPLE:



1. **6 months of base code purchases**
2. **Highest month identified**
3. **20% buffer added and round to the nearest 1000**

**P1.1462.6**

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**CUSTOMER EXAMPLE:**